

**HOUSE OF REPRESENTATIVES**  
STATE OF HAWAII  
STATE CAPITOL  
HONOLULU, HAWAII 96813

December 9, 2019

**VIA EMAIL ONLY**

Mr. Bob Pallarino  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
([redhill@epa.gov](mailto:redhill@epa.gov))

Ms. Roxanne Kwan  
State of Hawaii Department of Health  
Solid and Hazardous Waste Branch  
2827 Waimano Home Road, #100  
Pearl City, HI 96782  
([DOHrhcomments@HawaiiOIMT.onmicrosoft.com](mailto:DOHrhcomments@HawaiiOIMT.onmicrosoft.com))

RE: Red Hill Bulk Fuel Storage Facility Administrative Order on Consent  
Tank Upgrade Alternatives and Release Detection Decision Document

Dear Mr. Pallarino and Ms. Kwan,

Thank you for the opportunity to submit comments on the Tank Upgrade Alternatives and Release Detection Decision Document submitted by the U.S. Navy (Navy) and Defense Logistics Agency (DLA) in response to the Administrative Order on Consent. I cannot support the Navy/DLA decision to keep the current steel tank liner with a "comprehensive tank restoration and nozzle decommissioning process" and I urge the U.S. Environmental Protection Agency and the State of Hawaii Department of Health to reject this decision.

Preserving our clean and safe drinking water must be the highest priority. This precious resource is invaluable and irreplaceable. The recent Quantitative Risk and Vulnerability Assessment (Phase I) done by the Navy highlights the significant potential threat to our water supply from the Red Hill fuel tanks, including:

**Representative Linda Ichiyama**  
District 32 – Moanalua, Salt Lake & Aliamanu  
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- More than 27% probability of a sudden release of between 1,000 and 30,000 gallons of fuel each year;
- About a 34% chance of a sudden release of more than 120,000 gallons in the next 100 years; and
- Approximately 5,803 gallons per year of near-continuous, undetected fuel releases.

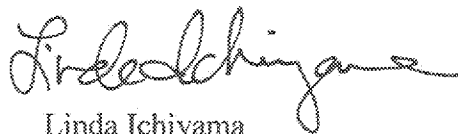
Notably, this study was limited to internal factors such as equipment failure or human operator error and did not include seismic, fire or flood events. Considering the above risks, the Navy/DLA's selection of the *least* protective Tank Upgrade Alternative is not enough.

Many constituents in the Moanalua, Salt Lake and Aliamanu area contacted me to voice their concerns about the fuel tanks at Red Hill and the safety of our drinking water. Thankfully, I can reassure them that our water is safe to drink. This decision on the Tank Upgrade Alternative will have a direct impact on whether I can continue to offer that reassurance in the future.

I appreciate the significance of the fuel stored in Red Hill and its necessity to the defense of our national security. By asking the difficult questions and making a concerted effort to obtain the resources needed, we can support military strategic priorities and protect our natural resources. I will continue to engage in discussions with our federal and military partners on this issue.

Thank you again for the opportunity to submit the above comments. If you have any questions or need additional information, please do not hesitate to contact my office at (808) 586-6220 or via email at [repichiyama@capitol.hawaii.gov](mailto:repichiyama@capitol.hawaii.gov).

Sincerely,



Linda Ichiyama  
State Representative, District 32

cc: U.S. Navy